

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
Jackson Division

MISSISSIPPI ASSOCIATION OF)
EDUCATORS, BARBARA PHILLIPS,)
JAMES THOMAS, DAWN ZIMMERER,) Civil No. 3:25-cv-00417-HTW-LGI
L.E. JIBOL, UNITED CAMPUS WORKERS)
SOUTHEAST LOCAL 3821, MADISYN)
DONLEY, ALEXIS COBBS, KAREN)
ADERER, FOSTERING LGBTQ+)
ADVOCACY, RESOURCES,)
ENVIRONMENTS AND WOMEN IN)
SCIENCE AND ENGINEERING,)
)

Plaintiffs,

v.

LYNN FITCH, in her official capacity as
Attorney General of Mississippi, GEE
OGLETREE, in their official capacity as
President of the Board of Trustees of State
Institutions of Higher Learning, STEVEN
CUNNINGHAM, AMY ARRINGTON,
DONALD CLARK, JR., ORMELLA
CUMMINGS, JERRY L. GRIFFITH,
JIMMY HEIDELBERG, TERESA
HUBBARD, BRUCE MARTIN, HAL
PARKER, GREGG RADER, and CHARLIE
STEPHENSON, all in their official capacities
as Members of the Board of Trustees of State
Institutions of Higher Learning, JOHN
PIGOTT, in their official capacity as Chair of
the Mississippi Community College Board,
CHERYL THURMOND, VIDET
CARMICHAEL, DONNIE CAUGHMAN,
BUBBA HUDSPETH, DOLLY
MARASCALCO, JOHNNY McRIGHT,
LUKE MONTGOMERY, WILL SYMMES,
and DIANNE WATSON, all in their official
capacities as Members of the Mississippi
Community College Board, GLEN EAST, in
their official capacity as Chair of the
Mississippi State Board of Education, MATT
MILLER, LANCE EVANS, WENDI
BARRETT, MATT MAYO, BILL JACOBS,
RONNIE McGEHEE, MIKE PRUITT,

BILLYE JEAN STROUD, and MARY WERNER, all in their official capacities as Members of the Mississippi State Board of Education, MARCY SCOGGINS, in their official capacity as Chair of the Mississippi Charter School Authorizer Board, JAY CARNEY, SANDRA McKIERNON, ERIN MEYER, BEN MORGAN, CANDACE ROBINS, and JENNIFER JACKSON WHITTIER, all in their official capacities as Members of the Mississippi Charter School Authorizer Board

Defendants.

DECLARATION OF KAREN ADERER

Pursuant to 28 U.S.C. § 1746, I, Karen Aderer, make the following declaration under penalty of perjury:

1. My name is Karen Aderer. My place of residence is Hattiesburg, Mississippi.
2. I am a Lecturer in Social Work at the University of Southern Mississippi in Hattiesburg, Mississippi and have been a full-time faculty member for 13 years. I have a Bachelor of Science in Psychology, a Master's degree in Social Work, and am a Licensed Master Social Worker (LMSW).
3. Many of the concepts seemingly banned by the law are essential to the way I teach my courses and the discipline of social work. These concepts are integral to my job and my right to free speech. I want to continue doing my job teaching social work curriculum as before, without fear.
4. In the fall 2025 semester, I will teach three undergraduate courses in the social work department: Human Rights and Social Justice; Human Behavior in the Social Environment II: Transitions in Adult Life (HBSE II); and Practice I. Additionally, I will teach Human Rights and Social Justice in the Master of Social Work program.

5. HBSE II involves defining and discussing the ways that gender and sexual identity, and bias and discrimination across the lifespan have an impact on the human development of an individual. This involves discussion of how issues like racism, sexism, heterosexism, historical trauma, the impact of poverty, advantage and disadvantage, and marginalization influence people's development and outcomes. HB 1193 may prohibit these and other related topics listed under Sections 3(b), 3(g), and 3(i). This law creates fear that I may be reported for speaking about a topic that is vaguely prohibited in this bill, which will have a chilling effect on the way I teach and the content I choose. This "reporting" aspect also creates an environment where a student may be unhappy with a grade or topic and engage in a retaliatory action against an instructor for this reason.
6. Anti-racism instruction is dictated by the 2022 Council on Social Work Education (CSWE) EPAS Standards as something that must be included in our curriculum. In Human Rights and Social Justice, anti-racism is a huge part of the class content. We discuss how racism impacts things like the criminal justice system, police brutality, maternal health outcomes, health and income disparities, and many more. We also discuss things like sexual assault, human trafficking, sexism, hate crimes, and many other topics that could be interpreted as pertaining to diversity, equity, and inclusion. This class examines current or recent human rights abuses that have occurred, and these typically have to do with areas of marginalization, discrimination, and bias. All of this may be banned by HB 1193 even though it is essential to a social work curriculum.
7. Each semester I have multiple transgender or nonbinary students in my classes, so removing discussion of these identities could impact their self-acceptance and mental health. Many of these students also express that they would like us to use gender neutral pronouns, which would be prohibited by HB 1193 Section 3(h). I consider using a person's pronouns a form of

respect, and not to do so would be asking me to be disrespectful to a student. This requirement does nothing to decrease discrimination in the classroom, but rather amplifies it.

8. One of the more challenging concepts for students that I discuss is the idea of transgender/non-binary/intersex people. I discuss this from a scientific background in terms of how challenging it is to come up with a unified definition of gender based on chromosome, genitalia, internal/external sex organs, hormones, etc. I show a video about the South African assigned-female-at-birth Olympic runner Caster Semenya, and how the International Association of Athletics Federations (IAAF) has changed its definition of male and female many times over the years, hammering home the point that determining gender is not an easy distinction to make. We also discuss the very high teen suicide attempt and completion rates for trans and gay teens. These concepts are expressly prohibited by this act, which allows educators to discuss gender only in binary male/female terms.
9. HB 1193 3(g) and 3(i) prohibits “diversity, equity and inclusion training” or “diversity trainings.” This language is so vague that I am unsure if I am permitted to require reflection papers or class discussions about topics such as views or experiences that explore “race, sex, color, national origin, gender identity, sexual orientation.” Reflection and discussion are a huge part of my classes and the social work curriculum. In social work, we believe one of the most important things for social workers is to be introspective and to reflect on the ways that our own experiences, culture, education and social learning may influence the way we view and interact with a client. I cannot adequately teach the course material if I am prohibited from requiring reflection on these topics in order to illustrate the importance of protecting against unintentionally or intentionally doing harm to our clients.
10. My work is impacted by the following sections of HB 1193: 3(b), 3(i), 3(f), 3(g). It is not clear to me what exactly is prohibited under the law. Because of how vague the law is and because some of it expressly bans what I teach, in some instances, I may self-censor to avoid

violating the law. In other instances, I may continue to teach as I have in the past and risk violating the law. HB 1193 will result in me not teaching ideas and topics which are integral to the discipline of social work.

11. I have concerns that by interacting in the classroom as I always have done, I will face consequences such as discipline or even termination. If the University of Southern Mississippi loses all state funding, my department and I will be negatively impacted by the funding cuts.
12. One of my biggest concerns about this law is that it will not allow me to meet CSWE Accreditation Standards. These standards include core competencies such as “advancing human rights and social justice, and engaging in anti-racism, diversity, equity, and inclusion”. Programs are expected to adopt the 2022 EPAS by July 2025.
13. HB 1193 would require a vast revision of my classes, and would not be in compliance with our accreditation standards, nor would it allow me academic freedom or freedom of speech in teaching certain topics that this law considers divisive, but that our profession’s Code of Ethics considers crucial.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed: July 10, 2025

Karen Aderer
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